

Defense Contract Audit Agency (DCAA)

DCAA and the Small Business Innovative Research (SBIR) Program

Judice Smith and Chang Ford

DCAA/Financial Liaison Advisors

NAVAIR 2010

Small Business Aviation Technology Conference

maintaining the data needed, and c including suggestions for reducing	lection of information is estimated to ompleting and reviewing the collect this burden, to Washington Headqu uld be aware that notwithstanding ar DMB control number.	ion of information. Send comments arters Services, Directorate for Info	regarding this burden estimate or ormation Operations and Reports	or any other aspect of the control o	his collection of information, Highway, Suite 1204, Arlington	
1. REPORT DATE NOV 2010		2. REPORT TYPE		3. DATES COVE	ered O to 00-00-2010	
4. TITLE AND SUBTITLE				5a. CONTRACT NUMBER		
DCAA And The Small Business Innovative Research (SBIR) Program				5b. GRANT NUMBER		
				5c. PROGRAM E	ELEMENT NUMBER	
6. AUTHOR(S)			5d. PROJECT NUMBER			
			5e. TASK NUMBER			
				5f. WORK UNIT NUMBER		
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) Defense Contract Audit Agency,8725 John J. Kingman Road, Suite 2135,Fort Belvoir,VA,22060-				8. PERFORMING ORGANIZATION REPORT NUMBER		
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)			10. SPONSOR/MONITOR'S ACRONYM(S)			
				11. SPONSOR/M NUMBER(S)	IONITOR'S REPORT	
12. DISTRIBUTION/AVAIL Approved for publ	ABILITY STATEMENT ic release; distributi	on unlimited				
	TES AVAIR Small Busin Education Center, C			Nov 16-17, 2	2010, Southern	
14. ABSTRACT						
15. SUBJECT TERMS						
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT	18. NUMBER OF PAGES	19a. NAME OF RESPONSIBLE PERSON	
a. REPORT unclassified	b. ABSTRACT unclassified	c. THIS PAGE unclassified	Same as Report (SAR)	38	RESPONSIBLE PERSON	

Report Documentation Page

Form Approved OMB No. 0704-0188

Presentation Overview

- DCAA Background Information
- DCAA and the SBIR Program
- Common DCAA SBIR Reviews
- Available Resources

Defense Contract Audit Agency

DCAA Background Information

Agency Mission

The DCAA Charter - DoD Directive 5105.36 states:

DCAA, while serving the public interest as its primary customer, shall perform all necessary contract audits for the Department of Defense and provide accounting and financial advisory services regarding contracts and subcontracts to all DoD Components responsible for procurement and contract administration. These services shall be provided in connection with negotiation, administration, and settlement of contracts and subcontracts to ensure taxpayer dollars are spent on fair and reasonable contract prices.

DCAA shall provide contract audit services to other Federal agencies, as appropriate.

DCAA Organizational Overview

- Approximately 4,000 employees
- More than 300 field audit offices
- United States and overseas

DCAA Products and Services

- Price Proposals
- Preaward Surveys
- Forward Pricing Labor & Overhead Rates
- Incurred Costs/Annual Overhead Rates
- Truth in Negotiation Act Compliance
- CAS (Cost Accounting Standards) Compliance & Adequacy
- Claims
- Contractor Internal Control System Audits
- Other reviews as requested by the contracting officer

What DCAA Will Not Do

- Establish accounting or any other types of management systems
- Recommend software programs
- Perform audits requested by the contractor
- Provide consulting services to the contractor
- Recommend a consultant

Defense Contract Audit Agency

DCAA and the SBIR Program

Field Pricing Support

FAR 15.404-2:

The contracting officer should request field pricing assistance when information available at the buying activity is inadequate to determine a fair and reasonable price.

SBIR Phase I at NAVAIR

Phase I is a feasibility study in which the small businesses will receive up to \$80,000 for a six month project to demonstrate the scientific, technical and commercial feasibility of the selected concept. An option is available for up to \$70,000 for interim activities between Phase I and Phase II, if the project is selected to receive a Phase II award. Phase I is normally a FFP contract with partial payments based on the submission and acceptance of reports from the company to NAVAIR.

In most cases, the NAVAIR Contract Specialist or Contracting Officer does not request DCAA's assistance with evaluating Phase I SBIRs.

SBIR Phase II at NAVAIR

Contractors with successful Phase I projects might be invited to participate in the next phase of the SBIR program. Phase II is typically a demonstration phase in which prototypes are built and tested. If selected, the small business will receive up to \$750,000 award.

The vast majority of Phase II SBIR contracts awarded by NAVAIR are on a Cost Plus Fixed Fee basis. In order to receive a cost type contract an offeror must have in place, prior to award, an accounting system that is adequate for accumulating costs under a flexibly priced (cost type) contract environment.

SBIR Phase III at NAVAIR

For Phase III funding, NAVAIR utilizes a multi-sponsor Indefinite Delivery, Indefinite Quantity (IDIQ) contract vehicle. To be eligible for an IDIQ Phase III contract the technology must be broad and useful to multiple military customers, must have a Phase II contract in process or completed, and there must be at least one NAVAIR sponsor interested in funding a Phase III.

A typical Phase III IDIQ contract has a period of performance of five years and can have a total contract value of up to \$25 million. Funding is allocated to the contract by Delivery Orders (DOs). DOs may be used on a time and materials, firm fixed price, or cost plus fixed fee basis.

Defense Contract Audit Agency

Common DCAA SBIR Reviews

Common DCAA Reviews Associated with SBIR Phase II and III Effort

Preaward Contract Audit Services

- Preaward Accounting Survey
- Forward Pricing Proposals

Postaward Contract Audit Services

- Incurred Costs
- Other Audits such as: floorchecks and public vouchers audits

Preaward Accounting Survey Audit

The preaward accounting system survey is an audit to determine the acceptability of a contractor's accounting system for accumulating costs under a prospective Government contract.

The auditor will need to obtain an understanding of the design of the prospective accounting system so as to appropriately complete the **SF 1408** - "Preaward Survey of Prospective Contractor Accounting System".

SF 1408

- Proper segregation of direct costs from indirect costs
- Identification and accumulation of direct costs by contract
- A logical and consistent method for allocation of indirect costs to intermediate and final cost objectives
- Accumulation of costs under general ledger control
- A timekeeping system that identifies employees' labor by intermediate or final cost objectives
- A labor distribution system that charges direct and indirect labor to the appropriate cost objectives

SF 1408

- Interim (at least monthly) determination of costs charged to a contract through routine posting to books of accounts
- Exclusion from costs charged to Government contracts of amounts that are not allowable pursuant to Federal Acquisition Regulation FAR 31, Contract Cost Principles and Procedures, or other contract provisions
- Identification of costs by contract line item and units if required by the proposed contract
- Segregation of preproduction costs from production costs

Common Problems Encountered During Accounting System Reviews

- Unallowable costs not accounted for separately
- No cumulative labor distribution and/or job cost ledgers
- No written policies and procedures

Common Problems Encountered During Accounting System Reviews

Timekeeping system problems:

- No official system in place
- No written instructions/policies/procedures
- System not linked to accounting system
- Recording of direct charges only
- Recording by direct-type personnel only
- All hours worked are not recorded
- Improper timecard preparation

INDIVIDUAL PRICE PROPOSALS (Common with Phase II/III SBIRs) Represents effort expended to examine estimates of entire price proposals submitted by contractors in connection with the award of government contracts.

AUDIT OF A PART OF A PROPOSAL (Common with Phase II/III SBIRs)

Represents effort expended to examine and express an opinion on one or more parts of a forward pricing proposal. A part of a proposal may be an entire cost element or part of a cost element (e.g., rates or bases), but not the entire proposal.

AGREED UPON PROCEDURES

Represents effort expended to perform specific procedures as a result of command and auditor agreement (regarding the procedures to be performed) in the evaluation of forward pricing proposals.

Important! FAR 15.408, Table 15-2, provides instructions on preparing a proposal and the backup required when cost or pricing data are required.

There are a lot of additional aids and guidance out there. However, FAR is the actual regulation.

We do not have the time to go over Table 15-2 during this presentation. However, I will mention some common problems encountered during proposal reviews.

Chapter 3 of DCAA's DCAAP 7641.90 "Information for Contractors" provides additional guidance regarding proposal requirements, examples of data DCAA may request, as well as a model proposal (www.dcaa.mil).

Data should be provided in electronic format.

An adequately supported proposal submission will result in an expedited audit evaluation.

Advanced Tank Technologies Washington, DC Proposal Submitted in Response To RFP DAAH01-02-R-0001

Element of Cost	<u>Amount</u>	Reference
Engineering Labor	\$452,151	Schedule 1
Manufacturing Labor	26,412	Schedule 1
Direct Labor Overhead @ 56.7%	271,345	Schedule 3
Material	113,175	Schedule 2
Material Handling Overhead @ 5.0%	<u>5,659</u>	Schedule 5
Subtotal	868,742	
G&A @ 8.0%	69,499	Schedule 4
Estimated Cost	938,241	
Profit @ 10.0%	93,824 *	
Total Price	\$1,032,065	

Example is in DCAA's "Information for Contractors" www.dcaa.mil

Common Deficiencies Found in Forward Pricing Proposals

Failure to provide the basis for proposed material, labor, other direct costs

Lack of a consolidated bill of materials

No support for indirect expenses and/or improper allocation bases

Lack of budgetary data to evaluate indirect rates

Failure to account for period of performance - rates often change each contractor fiscal year

Common Deficiencies Found in Forward Pricing Proposals

Unallowable costs included in proposal (FAR 31.205)

Proposal not mathematically correct

Supporting schedules do not tie into summary

Poor or no index of cost & pricing data

Following examples too closely – if you don't have a material overhead pool, don't proposal a material overhead rate

Incurred Cost Proposals

The Allowable Cost And Payment clause (FAR 52.216-7) requires that the contractor submit an adequate final incurred cost proposal together with supporting data, within 6 months after the end of its fiscal year. This proposal should include a signed "Certificate of Indirect Costs" in accordance with FAR 42.703-2. A copy of this certificate may be found in FAR 52.242-4.

Incurred Cost Proposals

The Incurred Cost Electronically (ICE) Model, which is the electronic version of the Model Incurred Cost Proposal in Chapter 6 of DCAA's DCAAP 7641.90, provides contractors with a standard user-friendly ICE submission package that will assist them in preparing adequate incurred cost proposals in accordance with FAR 52.216-7

Other Potential Audits

Floor Checks

DCAA auditors periodically perform physical observations of work areas and inquiries of employees to determine if: (1) employees are actually at work, (2) employees are performing in their assigned job classification, and (3) employee time is charged to the appropriate job or indirect account. These types of audits are referred to as floor checks. DCAA will perform unannounced floor checks to determine the adequacy and accuracy of the timekeeping system for reimbursement of labor costs under cost reimbursable contracts.

Public Vouchers

The contracting officer may request DCAA to review a public voucher.

Defense Contract Audit Agency

Available Resources

General Resources

General SBIR Resources: Contracting Officer/ Contract Specialist

Department of Defense SBIR Program:

http://www.acq.osd.mil/sadbu/sbir/

NAVY SBIR Process: http://www.navair.navy.mil/sbir/

NAVAIR SBIR Program: http://www.navysbir.com/overview.htm

SBIR Gateway: http://www.zyn.com/sbir/

This is the web site that covers the National SBIR Conferences and links to all of the agencies SBIR pages (not just DoD).

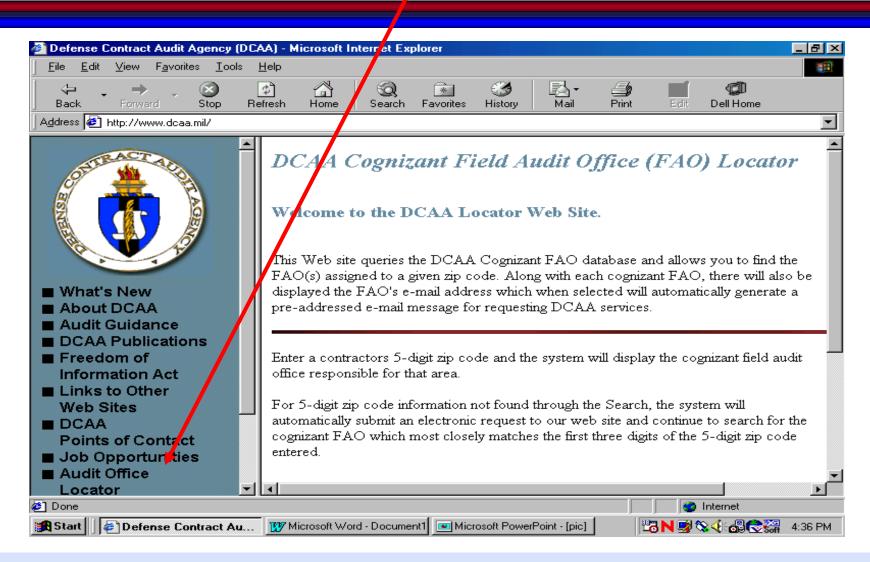
Federal Acquisition Regulations: http://farsite.hill.af.mil/

DCAA Resources

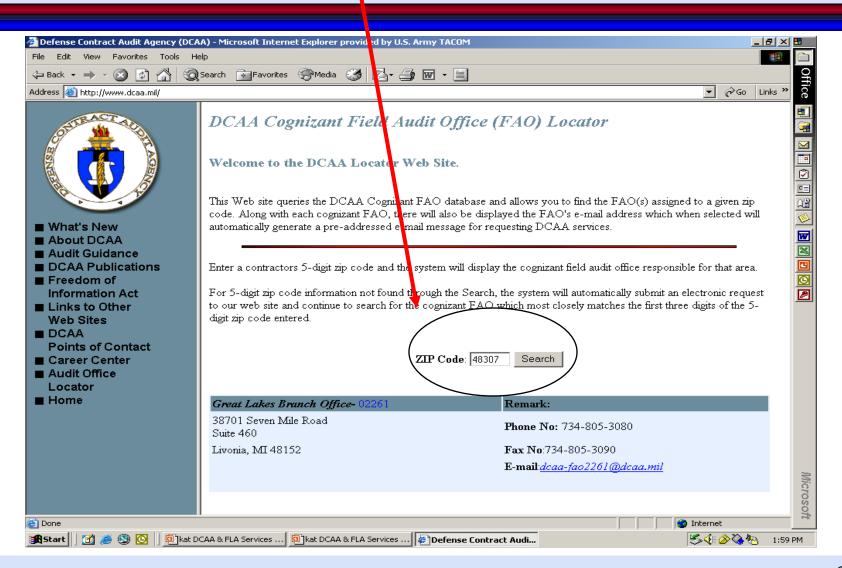
DCAA Website: www.dcaa.mil

- Your local Field Audit Office
- DCAAP 7641.90 "Information for Contractors"

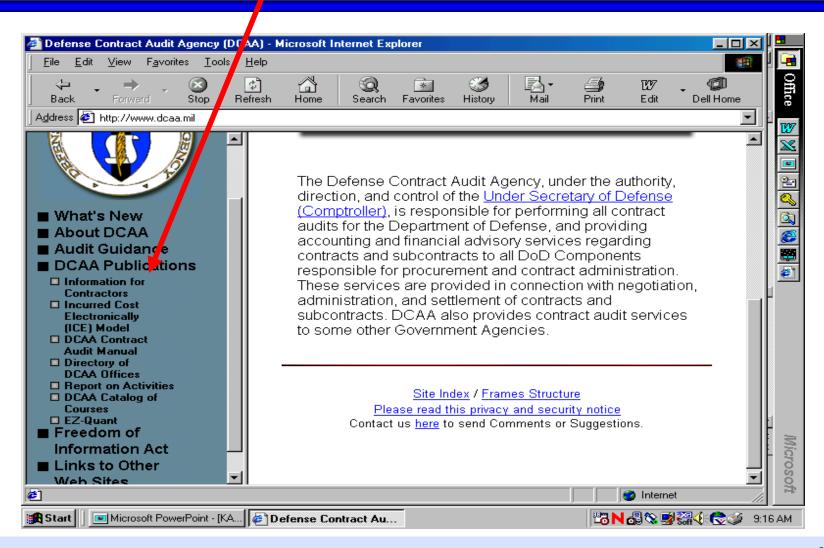
Click on Audit Office Locator



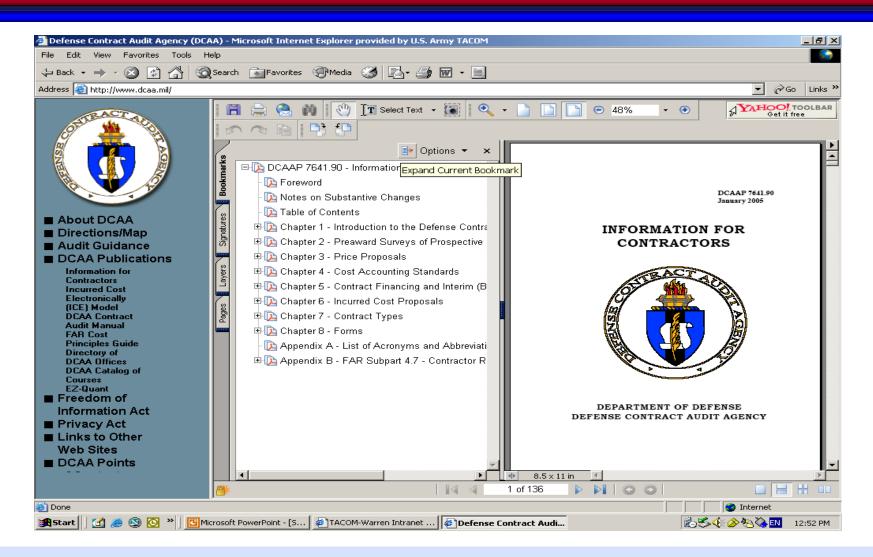
Type in Contractor's Zip Code and Hit Search



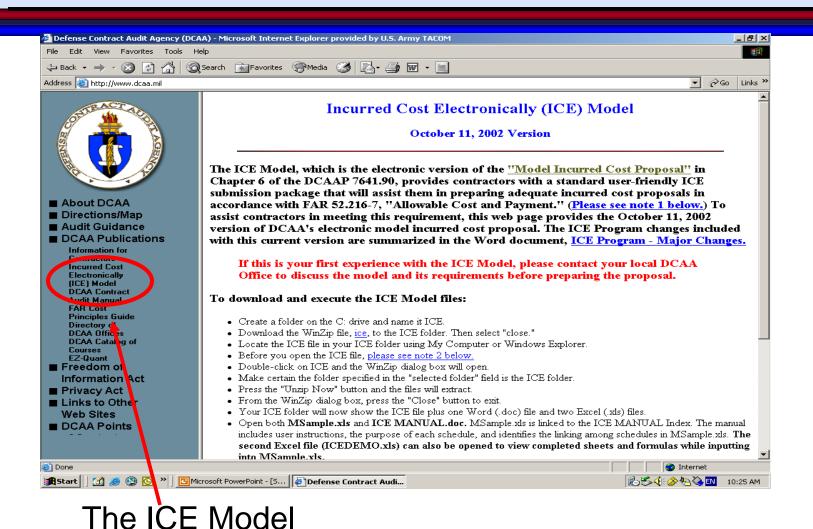
Information For Contractors



Information For Contractors



www.dcaa.mil



Final Comments

The following references will not address all of the regulations nor answer all your questions. However, when it comes to cost and accounting issues, the following references provide a very good foundation for SBIR contractors:

- FAR Part 15 Contracting by Negotiation
- FAR Part 31 Contract Cost Principles and Procedures
- DCAAP 7641.90 "Information for Contractors" The entire book is good, but the following are key for SBIRs
 - Chapter 2 Preaward Surveys
 - Chapter 3 Price Proposals
 - Chapter 5 Contract Financing and Interim Billing
 - Chapter 6 Incurred Cost Projections

Questions?

